

1 JOHNSON & PHAM, LLP
2 Christopher Q. Pham, SBN: 206697
3 E-mail: cpham@johnsonpham.com
Marcus F. Chaney, SBN: 245227
E-mail: mchaney@johnsonpham.com
4 Jason R. Vener, SBN: 267941
E-mail: jvener@johnsonpham.com
5 6355 Topanga Canyon Boulevard, Suite 326
Woodland Hills, California 91367
Telephone: (818) 888-7540
6 Facsimile: (818) 888-7544

7 Attorneys for Plaintiff
8 Adobe Systems Incorporated

9 Colby B. Springer (214868)
cspringer@lrrlaw.com

10 **LEWIS ROCA ROTGERBER LLP**
4300 Bohannon Drive, Suite 230
11 Menlo Park, CA 94025
T: (650) 391-1394
12 F: (650) 687-8492

13 Christopher R. Liro (*admitted PHV*)
chris.liro@andruslaw.com

14 **ANDRUS INTELLECTUAL PROPERTY LAW, LLP**
100 East Wisconsin Avenue, Suite 1100
15 Milwaukee, WI 53202
T: (414) 271-7590
F: (414) 271-5770

16 Attorneys for Defendant
17 SHAMCY ALGHAZZY

18
19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **SAN JOSE DIVISION**

22 ADOBE SYSTEMS INCORPORATED, a
23 Delaware Corporation,

24 Plaintiff,

25 v.

26 SHAMCY ALGHAZZY, an individual, doing
27 business as SA SOFTWARE; and DOES 1-10,
Inclusive,

28 Defendants.

Case No. 5:15-cv-01443 BLF

**STIPULATION OF THE PARTIES RE
PRE-TRIAL SCHEDULE AND
~~[PROPOSED]~~ ORDER**

1 Honorable Beth Labson Freeman
 2

3 **STIPULATION RE PRE-TRIAL DATES**

4 WHEREAS, Plaintiff Adobe Systems Incorporated (“Plaintiff”) and Defendant Shamcy
 5 Alghazzy (“Defendant”), through counsel, appeared before the Court at the September 3, 2015
 6 Case Management Conference (Document 33); and

7 WHEREAS, the Court set forth the following Trial and Pre-Trial Dates (*See* Document
 8 34):

9 **Scheduled Trial and Pre-Trial Dates**

10 EVENT	11 DATE OR DEADLINE
11 Last Day to Hear Dispositive Motions	12/15/2016 at 9:00 am
12 Final Pretrial Conference	02/09/2017 at 1:30 pm
13 Trial	03/06/2017 at 9:00 am

14 WHEREAS, at the September 3, 2015 Case Management Conference the Court Ordered
 15 the Parties to meet and confer and stipulate to a Pre-trial schedule in accordance with the above
 16 Trial and Pre-Trial Dates scheduled by the Court. (Document 34)

17 WHEREAS, the Parties have previously stipulated to an ADR Completion Deadline for
 18 twenty-eight (28) days before the close of non-expert discovery. (Document 31)

19 NOW, THEREFORE, the parties, through counsel, hereby stipulate to the following
 20 additional Pre-Trial Dates:

21 **Proposed Additional Pre-Trial Dates**

22 EVENT	23 DATE OR DEADLINE
23 ADR Completion Date:	August 30, 2016
24 Non-Expert Discovery Completion Date:	September 27, 2016
25 Designation and Disclosure of Experts (Non- 26 Rebuttal):	October 18, 2016
27 Dispositive Motion Filing Date:	November 1, 2016

1	Designation and Disclosure of Experts	November 18, 2016
2	(Rebuttal):	
3	Expert Discovery Completion Date:	January 6, 2017

4 **IT IS SO STIPULATED AND AGREED BY THE PARTIES.**

5 DATED: September 17, 2015 JOHNSON & PHAM, LLP

6
7 By: /s/ Jason R. Vener
8 Jason R. Vener, Esq.
9 Attorneys for Plaintiff
10 Adobe Systems Incorporated

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12 DATED: September 17, 2015 **ANDRUS INTELLECTUAL PROPERTY**
13 **LAW, LLP**

14
15
16 By: /s/ Christopher R. Liro
17 Christopher R. Liro
18 Attorney for Defendant
19 Shamcy Alghazzy

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[PROPOSED] ORDER

The Court, having reviewed the above stipulation of the parties and the Proposed Additional Pre-Trial Dates set forth therein, hereby ORDERS scheduled, the following Pre-Trial Dates and/or Deadlines:

Additional Pre-Trial Dates

EVENT	DATE OR DEADLINE
ADR Completion Date:	August 30, 2016
Non-Expert Discovery Completion Date:	September 27, 2016
Designation and Disclosure of Experts (Non-Rebuttal):	October 18, 2016
Dispositive Motion Filing Date:	November 1, 2016
Designation and Disclosure of Experts (Rebuttal):	November 18, 2016
Expert Discovery Completion Date:	January 6, 2017

IT IS SO ORDERED.

Signed this 18 day of September, 2015



THE HONORABLE BETH LABSON FREEMAN

UNITED STATES DISTRICT JUDGE

1
2 **PROOF OF SERVICE**

3 I am a resident of the State of California, over the age of eighteen years, and
4 not a party to the within action. My business address is Johnson & Pham, LLP,
5 6355 Topanga Canyon Blvd., Suite 326, Woodland Hills, California 91367. On
6 September 17, 2015, I served the within document(s):

7 **STIPULATION OF THE PARTIES RE PRE-TRIAL SCHEDULE AND**
8 **[PROPOSED] ORDER**

9 **FACSIMILE** - by transmitting via facsimile the document(s) listed
10 above to the fax number(s) set forth on the attached Telecommunications Cover
11 Page(s) on this date before 5:00 p.m.

12 **MAIL** - by placing the document(s) listed above in a sealed envelope
13 with postage thereon fully prepaid, in the United States mail at Woodland Hills,
14 California addressed as set forth below.

15 **PERSONAL SERVICE** - by personally delivering the document(s)
16 listed above to the person(s) at the address(es) set forth below.

17 **OVERNIGHT COURIER** - by placing the document(s) listed above
18 in a sealed envelope with shipping prepaid, and depositing in a collection box for
19 next day delivery to the person(s) at the address(es) set forth below via UNITED
20 PARCEL SERVICE.

21 Colby B. Springer
22 LEWIS ROCA ROTHGERBER LLP
23 4300 Bohannon Drive, Suite 230
24 Menlo Park, CA 94025

25 Christopher R. Liro
26 ANDRUS INTELLECTUAL PROPERTY LAW, LLP
27 100 East Wisconsin
28 Milwaukee, WI 53202

29 I am readily familiar with the firm's practice of collection and processing
30 correspondence for mailing. Under that practice it would be deposited with the
31 U.S. Postal Service on that same day with postage thereon fully prepaid in the
32 ordinary course of business. I am aware that on motion of the party served, service
33 is presumed invalid if postal cancellation date or postage meter date is more than
34 one day after date of deposit for mailing in affidavit.

35 I declare that I am employed in the office of a member of the bar of this
36 court at whose direction the service was made. Executed on September 17, 2015,
37 at Woodland Hills, California.

38 _____
39 /s/ Catherine Brannan
40 Catherine Brannan